

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HAJUQUAN WILLIAMS, Individually and For  
Others Similarly Situated,

v.

CHEMSTREAM, INC.

Case No. 2:24-cv-00272-MRH

**WILLIAMS' MOTION FOR REMAND**

Hajuquan Williams, Individually and for Others Similarly Situated ("Plaintiff") hereby moves to remand this matter to the Court of Common Pleas of Allegheny County, Pennsylvania. Chemstream is opposed to this Motion. On February 2, 2024, Williams filed this class action in the Court of Common Pleas of Allegheny County. On March 1, 2024, Chemstream removed the case to this Court on the basis of CAFA jurisdiction. However, Chemstream admitted that the class consists of only 46 members. Because CAFA requires a class of not less than 100 members, this Court lacks jurisdiction and remand is proper.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion and enter an Order remanding this matter to the Court of Common Pleas of Allegheny County.

Dated: March 29, 2024

Respectfully submitted,

/s/ Alyssa J. White

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**ATTORNEYS IN CHARGE FOR PLAINTIFF  
AND PUTATIVE CLASS MEMBERS**

**CERTIFICATE OF SERVICE**

I served a copy of this document on all counsel of record via the Court's ECF system on March 29, 2024.

/s/ Alyssa J. White  
Alyssa White

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with counsel for Defendant Chemstream, Inc. prior to the filing of this Motion. Chemstream is opposed.

/s/ Alyssa J. White  
Alyssa White